

Lewis & Co Planning

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Mr J Baeza
Planning Department
Arun District Council
1 Maltravers Road
Littlehampton
BN17 5LF

29th October 2021

Dear Mr Baeza

R/108/21/PL – Submission of Additional Information

Full planning application for the demolition of two dwellings and the construction of 3 No. 3-bed town houses and 7 flats. This site is in CIL Zone 4 and is CIL Liable as new dwellings at 117 Sea Lane Rustington BN16 2RU

We write regarding the above planning application. On 22nd October you advised you were minded to refuse the above application for four reasons. We write now to provide additional plans and information which, in our view, overcomes these reasons for refusal.

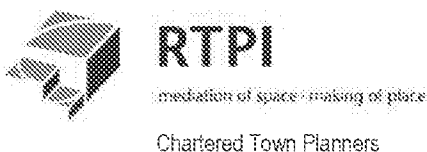
Each reason will be considered in turn.

Reason 1

Proposed reason for refusal 1 stated:

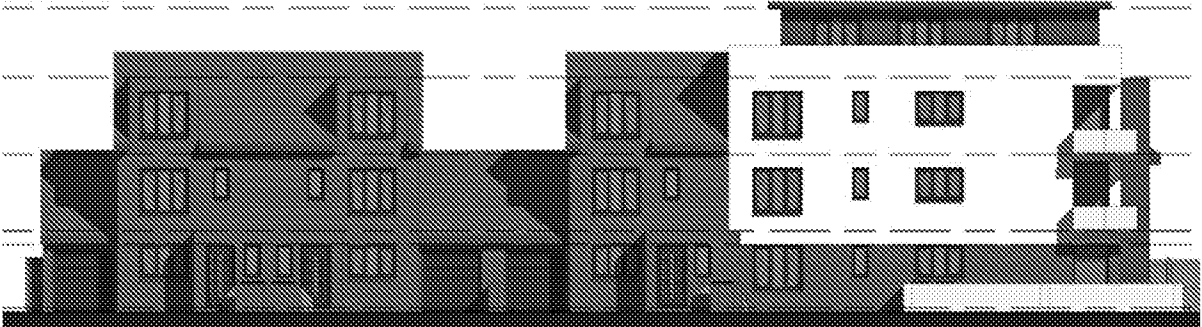
- 1. By virtue of its scale, bulk and height the development is considered to be out of character with the existing area and the absence of space around the development to provide sufficient landscaping will not mitigate this harm contrary to policies D DM1, D SP1 of the Arun Local Plan and policy 2 of the Rustington Neighbourhood Plan.*

Revised plans have now been submitted which reduces the quantum of development. The original submission proposed a four-storey block of 7 flats. The block of flats has now been revised to propose a three storey block of 5 flats. The revised elevation, as viewed from Shaftesbury Road is below.

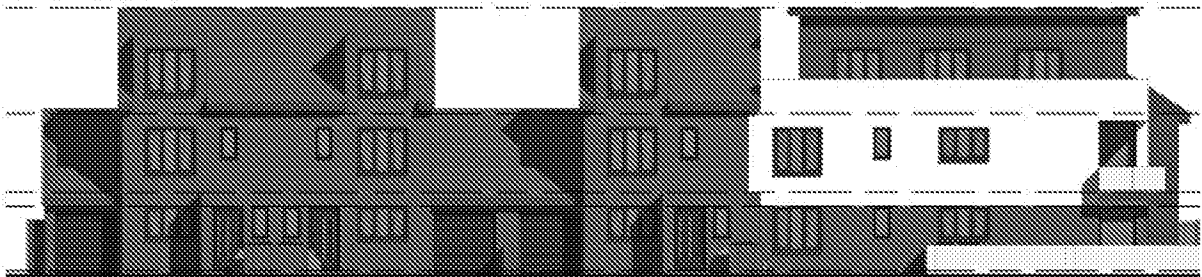


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Original submission



Revised proposal



With regard to landscaping, additional planting has been proposed along the site boundaries, to demonstrate the site can support further planting. We would expect a condition to be added to any consent requiring that a detailed landscaping strategy is to be submitted for approval.

Therefore, this proposed reason for refusal no longer applies.

Reason 2

Proposed reason for refusal 2 stated:

2. *The relationship of the rear windows of the block of flats and the closest town house garden is such that the proposal is overbearing and result in unacceptable overlooking contrary to policy D DM1 of the Arun Local Plan.*

Revised plans show a redesign of the layout of the 1st floor flat to remove potential overlooking. The new windows on the revised elevation are high level.

Therefore this objection has been overcome.

Reason 3

Proposed reason for refusal 3 states:

3. *There is an under provision of on site car parking to serve the development which will result in an unacceptable adverse highway environment by way of on street parking contrary to the Arun Parking Standards SPD and to policy T SP1 of the Arun Local Plan.*

The removal of two units from the scheme, and retention of all previously proposed parking spaces, improves the availability of off-road car parking for proposed residents.

Furthermore, in our view this reason for refusal is unsubstantiated. West Sussex County Highways Department submitted a 'No Objection' response to the application. They fully assessed the proposed parking strategy for the development in accordance with Arun District Council's parking standards SPD. They also undertook a site visit to inform their response. Therefore their 'no objection' response appears well-informed and justified.

With regard to car parking, WSCC state (see below):

As this development will provide an overall net increase in 9 dwellings, WSCC has consulted the WSCC residential car parking provision tool. This is used to understand what the expected parking demand might be and considers the location of the site and car ownership levels from census data. The calculator recommends the development could attract a parking demand of 16 spaces, which would be partially accommodated on site for 10 spaces. The remaining 6 spaces, if needed, would have to use the existing public highway.

Arun District Council Supplementary Planning document (Jan 2020) has also been consulted. Rustington West is in Parking Zone 4 and suggests a parking demand of 13 spaces, and 3 visitor parking spaces. This equates to 16 spaces as does the WSCC calculator. Assuming the development may demand an additional 3-6 on-street car parking spaces, a review of on-street parking has been undertaken.

In response to local concerns over parking, a site visit was undertaken by a WSCC Transport Planning Officer on the evening of Wednesday 16th June. As suspected, there were very few spaces on Shaftesbury Road, 3 were counted, but there were sufficient spaces free on Sea Lane. It is concluded there would be opportunities for any parking shortfall to be met on-street on Sea Lane, as an additional 3-6 cars would not create a severe impact from a highway safety point of view. However, the LPA may wish to offer their own views from an amenity perspective.

During the site visit the existing waiting restrictions were reviewed and these were acceptable for the location. The location of the access into the car park for the flats was considered a benefit for keeping visibility clear at the junction of Shaftesbury Road, and the only off-site works which will be required is the re-location of the existing telegraph pole.

An interrogation of the WSCC traffic monitoring database was undertaken as per Cllr Coopers request and no traffic surveys have been undertaken within this area, and it is not something we would ask for given the small nature of the development.

Due to this detailed assessment by the relevant qualifying authority, proposed reason for refusal 3 must be withdrawn.

Reason 4

Proposed reason for refusal 4 states:

4. *There is an inadequate level of outdoor amenity space, as recommended in the Arun Design Guide, proposed by the development to satisfactorily serve the needs prospective residential occupiers contrary to policy D DM1 of the Arun Local Plan.*

We assume the 'inadequate level' of outdoor amenity space refers the physical amount of space. Paragraph H.04 of the Arun Design Guide Supplementary Planning Document suggested the following quantum of outdoor amenity space is suitable:

- Private rear gardens should have a minimum depth of 10.5 metres
- Balconies should have a minimum of 3sqm of usable space

All balconies are at least 3sqm, with most being significantly larger (see page 2 of the submitted Design and Access Statement).

The rear gardens at a depth of 7.7sqm, which is considered to be in line with the aspirations of the SPD, given the overall private amenity space for each dwelling is between 92sqm and 100 sqm. This is a good level of private amenity space, and is fully in accordance with Policy D DM1, 'Aspects of form and design quality'.

The proposed amenity spaces comply with adopted planning policy requirements and are clearly of a good standard for development within a urban area. The site also has excellent access to public amenity space. Therefore, this proposed reason for refusal should be removed.

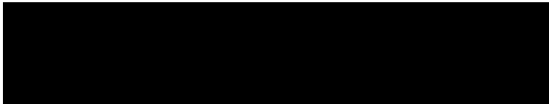
We trust this letter provides sufficient information for the application to now be assessed in a positive and proactive manner.

If you require further information please contact myself on the details below.

Yours sincerely

Julia Mitchell MRTPI

Senior Planner



Cc: Tim Hickling – Interim Head of Planning